

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

**SONICSOLUTIONS ALGAE CONTROL,  
LLC, SONIC SOLUTIONS, LLC, and  
ALGAECONTROL.US LLC,  
Plaintiffs,**

**v.**

**DIVERSIFIED POWER INTERNATIONAL,  
LLC, and ANTONIO TRIGIANI,  
Defendants.**

**C.A. No. 3:21-CV-30068-MGM**

**Notice of Taking Deposition  
of  
George Barton**

Please take notice that pursuant to Rule 30(b)(1) of the Rules of Civil Procedure, Plaintiff SonicSolutions Algae Control, LLC will take the deposition of **George Barton** at the offices of Wilson Worley PC, 2921 Meadowview Lane, 2<sup>nd</sup> Floor, Kingsport, TN 37662 on **Monday, April 18, 2022 at 9:30 a.m.** before a Notary Public or some other officer who is authorized by law to administer oaths. The deposition will be recorded by video (including audio) and stenographic means and will continue from day to day until concluded.

The deponent is further required to bring to the deposition the documents and information requested in the attached Schedule A.



You are invited to attend and examine the deponent.

Respectfully submitted,  
Plaintiffs/Defendants-in-Counterclaim,  
SonicSolutions Algae Control, LLC, Sonic  
Solutions, LLC, & AlgaeControl.US, LLC,  
By Their Attorneys

Dated: March 25, 2022

/s/ James C. Duda

James C. Duda, Esq., BBO 551207  
Lauren C. Ostberg, Esq., BBO 696883  
Bulkley, Richardson and Gelinas, LLP  
1500 Main Street, Suite 2700  
Springfield, MA 01115  
Tel: 413-272-6284  
Fax: 857-800-8249  
[jduda@bulkley.com](mailto:jduda@bulkley.com)  
[lostberg@bulkley.com](mailto:lostberg@bulkley.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this day of March 25, 2022, I have served or caused to be served a true and correct copy of the Notice of Deposition on all interested parties via first-class mail and electronic mail.

/s/James C. Duda  
James C. Duda

## **SCHEDULE A**

### **DEFINITIONS**

1. "ACUS" means AlgaeControl.US LLC, and its predecessor, agents, servants, employees, and any other person or entity acting or purporting to act on its behalf.
2. "Document" is used in the broadest sense and includes, but is not limited to, the following items, and drafts thereof, whether printed or recorded or reproduced by any other mechanical or electronic process, or written or produced by hand, namely: agreements; communications, including intra-company communications; correspondence; telegrams; memoranda; record books; summaries or records of personal conversations or interviews; diaries; minutes or records of meetings or conferences; reports or summaries of interviews; reports or summaries of investigations; opinions or reports of consultants; advertising or promotional literature; brochures; pamphlets; circulars; policies; policy applications; policy amendments; trade press releases; contracts; notes; projections; drafts of any documents; working papers; checks, front and back; check stubs or receipts; bills; receipts; any other documents or writings of whatever description including but not limited to any information contained in any computer although not yet printed out within your possession, custody or control or the possession, custody or control of any agent, employee (including without limitation, attorneys, accountants or advisers), or other person acting or purporting to act on your behalf. "Document" shall be defined to include electronically stored information.
3. "SSAC" means SonicSolutions Algae Control, LLC, and its agents, servants, and employees, and any other person or entity acting or purporting to act on its behalf.
4. "Sonic Solutions" means Sonic Solutions, LLC, and its agents, servants, and employees, and any other person or entity acting or purporting to act on its behalf.

### **INSTRUCTIONS**

1. Produce every responsive document or thing in your possession, custody, or control, or in the possession or control of your agents, servants, employees, representatives, or any other persons, including all attorneys, acting, or purporting to act on your behalf.
2. Produce not only every document or thing currently known to you but every such document or thing which can be located or discovered by you with diligent efforts.
3. Produce originals and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise.
4. Documents are to be produced in full and unexpurgated form.
5. If any responsive document has been destroyed, identify that document in your response as follows: addressor; addressee; indicated or blind copies; date; subject matter; number of pages; attachments or appendices; all persons to whom distributed, shown, or explained; date of destruction; person authorizing destruction; and person destroying the document.

6. In the event that any responsive document is withheld on the basis of any claim of privilege or similar claim, identify that document in your response as follows: addressor; addressee; indicated or blind copies; date; subject matter; number of pages; attachments or appendices; all persons to whom distributed, shown or explained; present custodian; and nature of the privilege asserted.

#### **DOCUMENTS REQUESTED**

1. All documents concerning any investigation or search of or for documents, including any investigation or search of or for electronically stored information, you conducted, assisted, or participated in or were requested to conduct, assist, or participate in, since March 1, 2021, concerning any litigation in which your current or former employer, Diversified Power International, was or is involved, including the matter that is the subject of this litigation, captioned *SonicSolutions Algae Control, LLC, Sonic Solutions, LLC, And Algaecontrol.Us LLC, v. Diversified Power International, LLC, and Antonio Trigiani*.

2. All documents concerning any investigation or search of or for documents, including any investigation or search of or for electronically stored information, you conducted, assisted, or participated in or were requested to conduct, assist, or participate in, since March 1, 2021, for documents sent to or received by Antonio Trigiani, Charlie Morgan, Lou Bourbon, Paul Woods, Brittany Childress, Faith Johnston, George Barton, Kristen Luttrell, Larry Peacock, and/or Hootie Hilton, which (a) contain one or more of the following terms: Sonic Solutions, George, SSAC, Dana, Tara, Devon, Obras Sanitarias del Estado, O.S.E., Algae Control, Dealer Agreement, or (b) contain the word or words HBS, Hydro Bioscience or algae.

3601679

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

SONICSOLUTIONS ALGAE CONTROL,	)	C.A. No. 3:21-CV-30068-MGM
LLC, SONIC SOLUTIONS, LLC, and	)	
ALGAECONTROL.US LLC,	)	<b>Notice of Taking Deposition</b>
Plaintiffs,	)	<b>of</b>
	)	<b>Donna Trigiani</b>
v.	)	
	)	
DIVERSIFIED POWER INTERNATIONAL,	)	
LLC, and ANTONIO TRIGIANI,	)	
Defendants.	)	

Please take notice that pursuant to Rule 30(b)(1) of the Rules of Civil Procedure, Plaintiff SonicSolutions Algae Control, LLC will take the deposition of **Donna Trigiani** at the offices of Wilson Worley PC, 2921 Meadowview Lane, 2<sup>nd</sup> Floor, Kingsport, TN 37662 on **Tuesday, April 19, 2022 at 9:00 a.m.** before a Notary Public or some other officer who is authorized by law to administer oaths. The deposition will be recorded by video (including audio) and stenographic means and will continue from day to day until concluded.

The deponent is further required to bring to the deposition the documents and information requested in the attached Schedule A.

You are invited to attend and examine the deponent.

Respectfully submitted,  
Plaintiffs/Defendants-in-Counterclaim,  
SonicSolutions Algae Control, LLC, Sonic  
Solutions, LLC, & AlgaeControl.US, LLC,  
By Their Attorney

Dated: March 25, 2022

/s/ James C. Duda

James C. Duda, Esq., BBO 551207  
Lauren C. Ostberg, Esq., BBO 696883  
Bulkley, Richardson and Gelinas, LLP  
1500 Main Street, Suite 2700  
Springfield, MA 01115  
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Fax: 857-800-8249  
[jduda@bulkley.com](mailto:jduda@bulkley.com)  
[lostberg@bulkley.com](mailto:lostberg@bulkley.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this day of March 25, 2022, I have served or caused to be served a true and correct copy of the Notice of Deposition on all interested parties via first-class mail and electronic mail.

/s/James C. Duda

James C. Duda

## **SCHEDULE A**

### **DEFINITIONS**

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3. "SSAC" means SonicSolutions Algae Control, LLC, and its agents, servants, and employees, and any other person or entity acting or purporting to act on its behalf.
4. "Sonic Solutions" means Sonic Solutions, LLC, and its agents, servants, and employees, and any other person or entity acting or purporting to act on its behalf.

### **INSTRUCTIONS**

1. Produce every responsive document or thing in your possession, custody or control, or in the possession or control of your agents, servants, employees, representatives, or any other persons, including all attorneys, acting or purporting to act on your behalf.
2. Produce not only every document or thing currently known to you but every such document or thing which can be located or discovered by you with diligent efforts.
3. Produce originals and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise.
4. Documents are to be produced in full and unexpurgated form.
5. In the event that any responsive document has been destroyed, identify that document in your response as follows: addressor; addressee; indicated or blind copies; date; subject matter; number of pages; attachments or appendices; all persons to whom distributed, shown or explained; date of destruction; person authorizing destruction; and person destroying the document.

6. In the event that any responsive document is withheld on the basis of any claim of privilege or similar claim, identify that document in your response as follows: addressor; addressee; indicated or blind copies; date; subject matter; number of pages; attachments or appendices; all persons to whom distributed, shown or explained; present custodian; and nature of the privilege asserted.

### **DOCUMENTS REQUESTED**

1. All documents concerning SSAC, ACUS, Sonic Solutions, AlgaeSonix, LLC, or Lawrence Field.

2. All communications between and/or among you and a member, employee, officer, or representative of SSAC, ACUS, Sonic Solutions, or AlgaeSonix, LLC.

3. All communications to, from, between, or among any of the following individuals, concerning SSAC, ACUS, Sonic Solutions, AlgaeSonix, LLC, or any employee, officer, or representative of any of these entities:

- a. Antonio Trigiani,
- b. Donna Trigiani,
- c. Charles Morgan,
- d. Paul Woods,
- e. George Barton,
- f. Faith Johnston,
- g. Brittany Childress,
- h. Larry Peacock,
- i. Hootie Hilton,
- j. Keith Bowman,
- k. Lou Bourbon,
- l. Heather Blair,
- m. Michael Wolf,
- n. Russell Urban,
- o. Rafael Rosa,
- p. Joseph Fulk, and/or
- q. Any other person.

4. All communications to or from one or more employees, officers, or representatives of any of the following:

- a. AGD,
- b. AWE Environmental,
- c. BBCon,
- d. BioBAC,



- e. CanDetec,
- f. Carbosur,
- g. Coast Water Solutions,
- h. Floratine Japan,
- i. Green Water Solutions,
- j. Hughes Water,
- k. Instrument & Supply,
- l. Iowa Pond Guy, LLC;
- m. Maryland Biochemical Co.;
- n. Miller's Turf;
- o. On Goldon Pond;
- p. Oververde;
- q. Pure Water Finland;
- r. PurOxi of California (now HydroCor),
- s. Re-Eco,
- t. Smoky Trout,
- u. AlgaeControl.CA,
- v. Sobitec, or
- w. T.A.S.O.

3601740

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

**SONICSOLUTIONS ALGAE CONTROL,  
LLC, SONIC SOLUTIONS, LLC, and  
ALGAECONTROL.US LLC,  
Plaintiffs,**

**v.**

**DIVERSIFIED POWER INTERNATIONAL,  
LLC, and ANTONIO TRIGIANI,  
Defendants.**

C.A. No. 3:21-CV-30068-MGM

**Notice of Taking Deposition  
of  
Paul Woods**

Please take notice that pursuant to Rule 30(b)(1) of the Rules of Civil Procedure, Plaintiff SonicSolutions Algae Control, LLC will take the deposition of Paul Woods at the offices of Wilson Worley PC, 2921 Meadowview Lane, 2<sup>nd</sup> Floor, Kingsport, TN 37662 on **Thursday, April 21, 2022 at 9:00 a.m.** before a Notary Public or some other officer who is authorized by law to administer oaths. The deposition will be recorded by video (including audio) and stenographic means and will continue from day to day until concluded.

The deponent is further required to bring to the deposition the documents and information requested in the attached Schedule A.

You are invited to attend and examine the deponent.

Respectfully submitted,  
Plaintiffs/Defendants-in-Counterclaim,  
SonicSolutions Algae Control, LLC, Sonic  
Solutions, LLC, & AlgaeControl.US, LLC,  
By Their Attorneys

Dated: March 25, 2022

/s/ James C. Duda

James C. Duda, Esq., BBO 551207  
Lauren C. Ostberg, Esq., BBO 696883  
Bulkley, Richardson and Gelinas, LLP  
1500 Main Street, Suite 2700  
Springfield, MA 01115  
Tel: 413-272-6284  
Fax: 857-800-8249  
[jduda@bulkley.com](mailto:jduda@bulkley.com)  
[lostberg@bulkley.com](mailto:lostberg@bulkley.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this day of March 25, 2022, I have served or caused to be served a true and correct copy of the Notice of Deposition on all interested parties via first-class mail and electronic mail.

/s/James C. Duda

James C. Duda

## **SCHEDULE A**

### **DEFINITIONS**

1. "ACUS" means AlgaeControl.US LLC, and its predecessor, agents, servants, employees, and any other person or entity acting or purporting to act on its behalf.
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3. "SSAC" means SonicSolutions Algae Control, LLC, and its agents, servants, and employees, and any other person or entity acting or purporting to act on its behalf.
4. "Sonic Solutions" means Sonic Solutions, LLC, and its agents, servants, and employees, and any other person or entity acting or purporting to act on its behalf.

### **INSTRUCTIONS**

1. Produce every responsive document or thing in your possession, custody or control, or in the possession or control of your agents, servants, employees, representatives, or any other persons, including all attorneys, acting or purporting to act on your behalf.
2. Produce not only every document or thing currently known to you but every such document or thing which can be located or discovered by you with diligent efforts.
3. Produce originals and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise.
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**DOCUMENTS REQUESTED**

1. All documents concerning SSAC, ACUS, Sonic Solutions, AlgaeSonix, LLC, or Lawrence Field.

2. All communications between and/or among you and a member, employee, officer, or representative of SSAC, ACUS, Sonic Solutions, or AlgaeSonix, LLC.

3. All communications to, from, between, or among any of the following individuals, concerning SSAC, ACUS, Sonic Solutions, AlgaeSonix, LLC, or any employee, officer, or representative of any of these entities:

- a. Antonio Trigiani,
- b. Donna Trigiani,
- c. Charles Morgan,
- d. Paul Woods,
- e. George Barton,
- f. Faith Johnston,
- g. Brittany Childress,
- h. Larry Peacock,
- i. Hootie Hilton,
- j. Keith Bowman,
- k. Lou Bourbon,
- l. Heather Blair,
- m. Michael Wolf,
- n. Russell Urban,
- o. Rafael Rosa,
- p. Joseph Fulk, and/or
- q. Any other person.

4. All communications to or from one or more employees, officers, or representatives of any of the following:

- a. AGD,
- b. AWE Environmental,
- c. BBCon,
- d. BioBAC,

- e. CanDetec,
- f. Carbosur,
- g. Coast Water Solutions,
- h. Floratine Japan,
- i. Green Water Solutions,
- j. Hughes Water,
- k. Instrument & Supply,
- l. Iowa Pond Guy, LLC;
- m. Maryland Biochemical Co.;
- n. Miller's Turf;
- o. On Goldon Pond;
- p. Oververde;
- q. Pure Water Finland;
- r. PurOxi of California (now HydroCor),
- s. Re-Eco,
- t. Smoky Trout,
- u. AlgaeControl.CA,
- v. Sobitec, or
- w. T.A.S.O.

3601758

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

SONICSOLUTIONS ALGAE CONTROL,	)	C.A. No. 3:21-CV-30068-MGM
LLC, SONIC SOLUTIONS, LLC, and	)	
ALGAECONTROL.US LLC,	)	<b>Notice of Taking Deposition</b>
Plaintiffs,	)	<b>of</b>
	)	<b>Keith Bowman</b>
v.	)	
	)	
DIVERSIFIED POWER INTERNATIONAL,	)	
LLC, and ANTONIO TRIGIANI,	)	
Defendants.	)	

Please take notice that pursuant to Rule 30(b)(1) of the Rules of Civil Procedure, Plaintiff SonicSolutions Algae Control, LLC will take the deposition of **Keith Bowman** at the offices of Wilson Worley PC, 2921 Meadowview Lane, 2<sup>nd</sup> Floor, Kingsport, TN 37662 on **Thursday, April 21, 2022 at 1:30 p.m.** before a Notary Public or some other officer who is authorized by law to administer oaths. The deposition will be recorded by video (including audio) and stenographic means and will continue from day to day until concluded.

The deponent is further required to bring to the deposition the documents and information requested in the attached Schedule A.

You are invited to attend and examine the deponent.

Respectfully submitted,  
Plaintiffs/Defendants-in-Counterclaim,  
SonicSolutions Algae Control, LLC, Sonic  
Solutions, LLC, & AlgaeControl.US, LLC,  
By Their Attorney

Dated: March 25, 2022

/s/ James C. Duda

James C. Duda, Esq., BBO 551207  
Lauren C. Ostberg, Esq., BBO 696883  
Bulkley, Richardson and Gelinas, LLP  
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Tel: 413-272-6284  
Fax: 857-800-8249  
[jduda@bulkley.com](mailto:jduda@bulkley.com)  
[lostberg@bulkley.com](mailto:lostberg@bulkley.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this day of March 25, 2022, I have served or caused to be served a true and correct copy of the Notice of Deposition on all interested parties via first-class mail and electronic mail.

/s/ James C. Duda

James C. Duda



## **SCHEDULE A**

### **DEFINITIONS**

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### **INSTRUCTIONS**

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**DOCUMENTS REQUESTED**

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3. All communications to, from, between, or among any of the following individuals, concerning SSAC, ACUS, Sonic Solutions, AlgaeSonix, LLC, or any employee, officer, or representative of any of these entities:

- a. Antonio Trigiani,
- b. Donna Trigiani,
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- g. Brittany Childress,
- h. Larry Peacock,
- i. Hootie Hilton,
- j. Keith Bowman,
- k. Lou Bourbon,
- l. Heather Blair,
- m. Michael Wolf,
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- o. Rafael Rosa,
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- c. BBCon,
- d. BioBAC,

- e. CanDetec,
- f. Carbosur,
- g. Coast Water Solutions,
- h. Floratine Japan,
- i. Green Water Solutions,
- j. Hughes Water,
- k. Instrument & Supply,
- l. Iowa Pond Guy, LLC;
- m. Maryland Biochemical Co.;
- n. Miller's Turf;
- o. On Goldon Pond;
- p. Oververde;
- q. Pure Water Finland;
- r. PurOxi of California (now HydroCor),
- s. Re-Eco,
- t. Smoky Trout,
- u. AlgaeControl.CA,
- v. Sobitec, or
- w. T.A.S.O.

3601779

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

SONICSOLUTIONS ALGAE CONTROL,	)	C.A. No. 3:21-CV-30068-MGM
LLC, SONIC SOLUTIONS, LLC, and	)	
ALGAECONTROL.US LLC,	)	<b>Notice of Taking Deposition</b>
Plaintiffs,	)	<b>of</b>
	)	<b>Larry Peacock</b>
v.	)	
	)	
DIVERSIFIED POWER INTERNATIONAL,	)	
LLC, and ANTONIO TRIGIANI,	)	
Defendants.	)	

Please take notice that pursuant to Rule 30(b)(1) of the Rules of Civil Procedure, Plaintiff SonicSolutions Algae Control, LLC will take the deposition of **Larry Peacock** at the offices of Wilson Worley PC, 2921 Meadowview Lane, 2<sup>nd</sup> Floor, Kingsport, TN 37662 on **Tuesday, April 19, 2022 at 1:30 p.m.** before a Notary Public or some other officer who is authorized by law to administer oaths. The deposition will be recorded by video (including audio) and stenographic means and will continue from day to day until concluded.

The deponent is further required to bring to the deposition the documents and information requested in the attached Schedule A.

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Respectfully submitted,  
Plaintiffs/Defendants-in-Counterclaim,  
SonicSolutions Algae Control, LLC, Sonic  
Solutions, LLC, & AlgaeControl.US, LLC,  
By Their Attorney

Dated: March 25, 2022

/s/ James C. Duda

James C. Duda, Esq., BBO 551207

Lauren C. Ostberg, Esq., BBO 696883

Bulkley, Richardson and Gelinas, LLP

1500 Main Street, Suite 2700

Springfield, MA 01115

Tel: 413-272-6284

Fax: 857-800-8249

jduda@bulkley.com

lostberg@bulkley.com

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this day of March 25, 2022, I have served or caused to be served a true and correct copy of the Notice of Deposition on all interested parties via first-class mail and electronic mail.

s/James C. Duda/

James C. Duda

## **SCHEDULE A**

### **DEFINITIONS**

1. "ACUS" means AlgaeControl.US LLC, and its predecessor, agents, servants, employees, and any other person or entity acting or purporting to act on its behalf.
2. "Document" is used in the broadest sense and includes, but is not limited to, the following items, and drafts thereof, whether printed or recorded or reproduced by any other mechanical or electronic process, or written or produced by hand, namely: agreements; communications, including intra-company communications; correspondence; telegrams; memoranda; record books; summaries or records of personal conversations or interviews; diaries; minutes or records of meetings or conferences; reports or summaries of interviews; reports or summaries of investigations; opinions or reports of consultants; advertising or promotional literature; brochures; pamphlets; circulars; policies; policy applications; policy amendments; trade press releases; contracts; notes; projections; drafts of any documents; working papers; checks, front and back; check stubs or receipts; bills; receipts; any other documents or writings of whatever description including but not limited to any information contained in any computer although not yet printed out within your possession, custody or control or the possession, custody or control of any agent, employee (including without limitation, attorneys, accountants or advisers), or other person acting or purporting to act on your behalf. "Document" shall be defined to include electronically stored information.
3. "SSAC" means SonicSolutions Algae Control, LLC, and its agents, servants, and employees, and any other person or entity acting or purporting to act on its behalf.
4. "Sonic Solutions" means Sonic Solutions, LLC, and its agents, servants, and employees, and any other person or entity acting or purporting to act on its behalf.

### **INSTRUCTIONS**

1. Produce every responsive document or thing in your possession, custody or control, or in the possession or control of your agents, servants, employees, representatives, or any other persons, including all attorneys, acting or purporting to act on your behalf.
2. Produce not only every document or thing currently known to you but every such document or thing which can be located or discovered by you with diligent efforts.
3. Produce originals and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise.
4. Documents are to be produced in full and unexpurgated form.
5. In the event that any responsive document has been destroyed, identify that document in your response as follows: addressor; addressee; indicated or blind copies; date; subject matter; number of pages; attachments or appendices; all persons to whom distributed, shown or explained; date of destruction; person authorizing destruction; and person destroying the document.

6. In the event that any responsive document is withheld on the basis of any claim of privilege or similar claim, identify that document in your response as follows: addressor; addressee; indicated or blind copies; date; subject matter; number of pages; attachments or appendices; all persons to whom distributed, shown or explained; present custodian; and nature of the privilege asserted.

**DOCUMENTS REQUESTED**

1. All documents concerning SSAC, ACUS, Sonic Solutions, AlgaeSonix, LLC, or Lawrence Field.

2. All communications between and/or among you and a member, employee, officer, or representative of SSAC, ACUS, Sonic Solutions, or AlgaeSonix, LLC.

3. All communications to, from, between, or among any of the following individuals, concerning SSAC, ACUS, Sonic Solutions, AlgaeSonix, LLC, or any employee, officer, or representative of any of these entities:

- a. Antonio Trigiani,
- b. Donna Trigiani,
- c. Charles Morgan,
- d. Paul Woods,
- e. George Barton,
- f. Faith Johnston,
- g. Brittany Childress,
- h. Larry Peacock,
- i. Hootie Hilton,
- j. Keith Bowman,
- k. Lou Bourbon,
- l. Heather Blair,
- m. Michael Wolf,
- n. Russell Urban,
- o. Rafael Rosa,
- p. Joseph Fulk, and/or
- q. Any other person.

4. All communications to or from one or more employees, officers, or representatives of any of the following:

- a. AGD,
- b. AWE Environmental,
- c. BBCon,
- d. BioBAC,

- e. CanDetec,
- f. Carbosur,
- g. Coast Water Solutions,
- h. Floratine Japan,
- i. Green Water Solutions,
- j. Hughes Water,
- k. Instrument & Supply,
- l. Iowa Pond Guy, LLC;
- m. Maryland Biochemical Co.;
- n. Miller's Turf;
- o. On Goldon Pond;
- p. Oververde;
- q. Pure Water Finland;
- r. PurOxi of California (now HydroCor),
- s. Re-Eco,
- t. Smoky Trout,
- u. AlgaeControl.CA,
- v. Sobitec, or
- w. T.A.S.O.

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